

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

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PUBLIC SERVICE
COMMISSION

In the Matter of:

AN ADJUSTMENT OF THE ELECTRIC)
RATES, TERMS AND CONDITIONS OF) CASE NO. 2003-00434
KENTUCKY UTILITIES COMPANY)

FIRST REQUEST FOR INFORMATION
OF NORTH AMERICAN STAINLESS TO
KENTUCKY UTILITIES COMPANY

Comes now North American Stainless (NAS) to submit these Requests for Information to Kentucky Utilities Company, to be answered by the date specified in the Commission's Order of Procedure, and in accord with the following:

- (1) In each case where a request seeks data provided in response to a NAS request, reference to the appropriate request item will be deemed a satisfactory response.
- (2) Please identify the witness who will be prepared to answer questions concerning each request.
- (3) These requests shall be deemed continuing so as to require further and supplemental responses if the company receives or generates additional information within the scope of these requests between the time of the response and the time of any hearing conducted hereon.
- (4) If any request appears confusing, please request clarification directly from North American Stainless counsel.
- (5) To the extent that the specific document, workpaper or information as requested does not exist, but a similar document, workpaper or information does exist, provide the similar document, workpapers, or information.

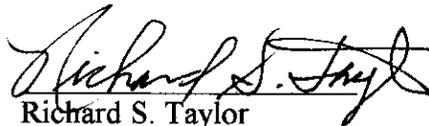
(6) To the extent that any request may be answered by way of a computer printout, please identify each variable contained in the printout which would not be self evident to a person not familiar with the printout.

(7) If the company has objections to any request on the grounds that the requested information is proprietary in nature, or for any other reason, please notify North American Stainless counsel as soon as possible.

(8) For any document withheld on the basis of privilege, state the following: date, author; addressee; indicated or blind copies; all persons to whom distributed, shown, or explained; and, the nature and legal basis for the privilege asserted.

(9) In the event any document called for has been destroyed or transferred beyond the control of the company, please state: the identity of the person by whom it was destroyed or transferred, and the person authorizing the destruction or transfer; the time, place, and method of destruction or transfer; and, the reason(s) for its destruction or transfer. If destroyed or disposed of by operation of a retention policy, state the retention policy.

Respectfully submitted,



Richard S. Taylor
Attorney-at-Law
225 Capital Avenue
Frankfort, KY 40601

Dated: March 1, 2004

CERTIFICATE OF SERVICE AND NOTICE OF FILING

I hereby give notice that this 1st day of March, 2004, I have filed the original and eight copies of the foregoing with the Executive Director of the Kentucky Public Service Commission at 211 Sower Boulevard, Frankfort, Kentucky, 40601 and certify that this same day I have served the parties by mailing a true copy of same, postage prepaid, to those listed below.

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Richard S. Taylor

**FIRST SET OF DATA REQUESTS FROM NORTH AMERICAN STAINLESS
TO KENTUCKY UTILITIES COMPANY AND
LOUISVILLE GAS AND ELECTRIC COMPANY
CASE NO. 2003-00434**

- ~~1~~-NAS-1.1 Refer to Seelye Exhibit 12, page 1 of 1, and Seelye Exhibit 15, page 23 of 31. Both Exhibits show NAS's on-peak demand to be 962,182 KW and off-peak demand as 987,308 KW.
- a. Do these demand levels reflect actual test year billing demands for each month of the test year? If not, please explain the source and derivation of the referenced demand levels?
 - b. Are the demands reflected in Seelye Exhibits 12 and 15 based on 15-minute demand intervals?
 - c. Under the proposed NCLS Tariff, demand is measured on a 5-minute demand interval. Provide the test year on-peak and off-peak demands for the NAS Special Contract load based on a 5-minute demand interval.
 - d. Refer to KU Response to KIUC Question No. 40, Attachment page 1 of 1, and KIUC Question No. 32, Attachment page 2 of 6. They show NAS's on-peak demand as 909,144 KW and off-peak demand as 932,860.8 KW. Is the only reason for the differences in these demands as compared to Seelye Exhibits 12 and 15 due to the conversion to KVA or are there additional reasons? If there are other reasons, please explain.
- ~~2~~-NAS-1.2 Recalculate the revenue loss adjustment in Seelye Exhibit 12, page 1 of 1, by using the 5-minute demand intervals for columns (6) and (7) to reflect a full year of service under the proposed NCLS Tariff at the higher demand billing levels.
- ~~3~~-NAS-1.3 See Seelye Exhibit 5, page 4 of 72, Special Contracts column. Special Contracts have been allocated \$2,306,742,516 of Total Power Production Plant. However, page 1 of Exhibit 5 show the Company Total Power Production Plant as only \$1,456,969,104. Explain this apparent discrepancy.
- ~~4~~-NAS-1.4 Refer to KU Response to KIUC Question No. 106. The second sentence of that response states that "(S)uch non-conforming loads can result in significant costs".
- a-a. Specify and quantify what these referenced costs are.
 - b-b. Where specifically in this rate case filing (testimony, exhibits and tables) are these costs located?

e-c. Have the referenced costs been directly allocated to the NCLS customer? If so, please demonstrate how this has been accomplished.

5-NAS-1.5 Refer to KU Response to KIUC Question No. 116.

a-a. Specify which costs are being referred to in this response, and please identify the location of those costs in the cost of service study.

b-b. Refer to the last sentence of the response. What does “Company cost relative to customer sector” mean?

e-c. Please specify which “Commission approved methodologies” are being referred to.

d-d. Please specifically identify which methodologies are from the past and which are current.